

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)

Plaintiff,)

v.)

MISAEAL PADILLA GALVEZ)

Defendant.)

Case Number: 08 CR 235

Judge: Joan B. Gottschall

MOTION FOR EXTENTION OF TIME TO FILE
PRE-TRIAL MOTIONS

NOW COMES, the Defendant, **MR. MISAEAL PADILLA-GALVEZ**, by and through his attorney, **GAL PISSETZKY**, respectfully moves this Honorable Court to extend the time to file pre-trial motions. In support of his request, Mr. Padilla-Galvez. states as follows:

1. This Honorable Court requested that all pre-trial motions in this matter be filed by June 10, 2008.
2. Mr. Padilla-Galvez wishes to file some meritorious pre-trial motions.
3. The government sent voluminous discovery material to counsel that included audio CDs of recordings made during the investigation of the case.
4. Some of the CDs are unclear and Counsel must first enhance the audio to determine if the conversations are germane to any pre-trial motions.
5. Furthermore, some of the material on the CDs is in Spanish and counsel has had to have it translated into English.
6. Mr. Pissetzky has also been out of town for the entire week of June 2, 2008 in the Western District of Texas engaged in the matter of USA v. Parra.
7. Mr. Pissetzky, attorney for Mr. Padilla-Galvez, needs more time to review the audio CDs and other discovery to prepare any pre-trial motions.
8. This request is not made to delay the matter, but to see that justice is done and to assure continuity of counsel.

WHEREFORE, Mr. Misael Padilla-Galvez respectfully request that this Honorable Court grant his motion and extend the filing deadline in 30 days, or to any time the Court sees fit.

Respectfully submitted,

/s/ Gal Pissetzky
Gal Pissetzky
Attorney for Mr. Padilla-Galvez
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(312)566-9900

CERTIFICATE OF SERVICE

The undersigned, Gal Pissetzky, hereby certifies that in accordance with Fed.R.Crim.P. 49, Fed.R.Civ.P. 5, and the General Order on Electronic Case Filing (ECF), the

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was served on June 12, 2008, pursuant to the district court's ECF filers to the following:

AUSA Nathalina A. Hudson
Assistant United States Attorney
219 S. Dearborn St., 5th Floor
Chicago, IL 60604

Respectfully submitted,

/s/ Gal Pissetzky _____
Gal Pissetzky
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